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9 MAGDALENA KROWICKI

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 MAGDALENA KROWICKI,

13 Plaintiff,

14 vs.

15 LOWE'S HOME CENTERS, LLC, a Nevada
16 Foreign Limited-Liability Company dba
17 LOWE'S STORE #1836; DOES 1 through 10;
18 and ROE CORPORATIONS 1 through 10,
19 inclusive,

20 Defendants.

21 Case No.: 2:20-cv-00923-KJD-NJK

22 **STIPULATED MOTION AND ORDER**
TO EXTEND DEADLINE FOR FILING
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS PUNITIVE
DAMAGES

23 IT IS HEREBY STIPULATED by and between, Plaintiff Magdalena Krowicki
24 (“Plaintiff”) by and through her attorney, Jonathan T. Remmel, Esq. of the Remmel Law Firm,
25 and Defendant Lowe's Home Centers, LLC (“Defendant”) by and through its attorney, Ashlie L.
Surur, Esq. of Hall, Jaffe & Clayton, LLP, that the time for Plaintiff to file her opposition to
Defendant's Motion to Dismiss Punitive Damages (Doc #5), filed May 29, 2020, be extended to
and including **Friday, June 26, 2020**.

26 IT IS FURTHER STIPULATED that as a result of counsel for Plaintiff's office having
27 difficulties with receiving e-filings from the court, the Motion to Dismiss was inadvertently
28 overlooked and the deadline to oppose was never calendared.

1 Pursuant to Rule 6(b)(1)(B) which provides that for any act that must be done by a party
2 to a federal court proceeding within a specified time frame, the court may “for good cause,
3 extend the time...after the time has expired if the party failed to act because of excusable
4 neglect.”
5

6 The parties to this matter stipulate that good cause exists to extend the deadline due to
7 excusable neglect pursuant to Rule 6(b)(1)(B) and motion this Court to grant Plaintiff an
8 extension to, and including, Friday, June 26, 2020 within which to file her opposition to
9 Defendant’s Motion to Dismiss Punitive Damages (#5).
10

11 DATED: 06/18/2020
12

13 **REMMEL LAW FIRM**

14 /s/ Jonathan T. Remmel
15 JONATHAN T. REMMEL, ESQ. (8627)
804 South Jones Boulevard
16 Las Vegas, NV 89107
Attorney for Plaintiff,
17 MAGDALENA KROWICKI
18

DATED: 06/18/2020

HALL JAFFE & CLAYTON, LLP

14 /s/ Ashlie L. Surur
15 ASHLIE L. SURUR, ESQ. (11290)
7425 Peak Drive
16 Las Vegas, NV 89128
Attorney for Defendant,
17 LOWE’S HOME CENTERS, LLC
18

20 **ORDER**
21

22 Pursuant to the parties’ stipulation, **IT IS SO ORDERED**. Plaintiff shall have to and
23 including **Friday, June 26, 2020** within which to file her opposition to Defendant’s Motion to
24 Dismiss (Doc #5), filed May 29, 2020.
25

26 Dated: 06/22/2020
27


28 **UNITED STATES DISTRICT JUDGE**

Rebecca Lopez

From: Ashlie Surur [ASurur@lawhjc.com]
Sent: Thursday, June 18, 2020 11:45 AM
To: Rebecca Lopez
Cc: Jon Remmel; Michele M. Stones
Subject: RE: Lowe's adv. Krowicki - Joint Status Report, SAO re Response, Rule 26 Conf

Approved, You may file with my electronic signature.

ASHLIE L. SURUR, ESQ.

D: 702.316.4111 ext 125

C: 702.909.0838

asurur@lawhjc.com

From: Rebecca Lopez <becky@remmellaw.com>
Sent: Thursday, June 18, 2020 11:20 AM
To: Ashlie Surur <ASurur@lawhjc.com>
Cc: Jon Remmel <jon@remmellaw.com>
Subject: RE: Lowe's adv. Krowicki - Joint Status Report, SAO re Response, Rule 26 Conf

Hi Ashlie – Attached is a draft Stipulated Motion and Order to Extend Time to Respond to Defendant's Motion to Dismiss. The rule states that after the deadline, a request to extend must be made by motion, hence "Stipulated Motion and Order". Please review and let me know if you have any suggested revisions. Thanks again for your assistance on this.

Sincerely,

Rebecca Lopez, Paralegal

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From: Ashlie Surur [mailto:ASurur@lawhjc.com]
Sent: Thursday, June 18, 2020 11:10 AM
To: Rebecca Lopez
Cc: Michele M. Stones; Lisa Holding; Steve Jaffe; Cindy Call
Subject: Lowe's adv. Krowicki - Joint Status Report, SAO re Response, Rule 26 Conf

Hi Becky,

Attached is the proposed joint status report for your office's review and approval. As we discussed, we agree to extend the time for you to file a response to the motion to dismiss to June 26, 2020. We will keep a look out for the proposed stipulation. Finally, I will call Jonathan at 2:00 p.m. today for the Rule 26 conference.

ASHLIE L. SURUR, ESQ.